

UNITED STATES DISTRICT COURT

for the
Central District of California

In the Matter of the Search of:

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Case No. 2:24-mj-05462
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Ten United States Postal Service Priority Mail and
Three United States Postal Service Express parcels
in the custody of the United States Postal Inspection
Service in City of Industry, California, as further
described in Attachment A

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

See Attachment A

located in the Central District of California, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is :

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1), 843(b), 846	Distribution and Possession with Intent to Distribute a Controlled Substance; Unlawful Use of a Communication Facility, Including the Mails, to Facilitate the Distribution of a Controlled Substance; and Conspiracy

The application is based on these facts:

See attached Affidavit

- Continued on the attached sheet.

Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ Zachary Sumpter

Applicant's signature

Zachary Sumpter, USPIS Task Force Officer

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: September 9, 2024

Judge's signature

HON. CHARLES F. EICK, MAGISTRATE JUDGE

Printed name and title

AUSA: Jason Gorn (x7962)

ATTACHMENT A

PARCELS TO BE SEARCHED

The following United States Postal Service ("USPS") parcels seized from the mail stream on between September 3, 2024, and September 5, 2024, are currently in the custody of the United States Postal Inspection Service in City of Industry, California:

a. **SUBJECT PARCEL 1** is a USPS Priority Mail Express parcel bearing tracking number EI 701 829 190 US. **SUBJECT PARCEL 1** is a brown colored, large-sized USPS ReadyPost cardboard box. **SUBJECT PARCEL 1** is addressed to "Ashley Howard, 2704 Boxelder Ct., Raliegh, NC 27610." The return address listed on **SUBJECT PARCEL 1** is "Melissa Howard, 1130 N 13th Ave, Upland, CA 91786." **SUBJECT PARCEL 1** was postmarked on September 3, 2024, in the 91761 zip code.

b. **SUBJECT PARCEL 2** is a USPS Priority Mail parcel bearing tracking number 9505 5163 3324 4243 9231 13. **SUBJECT PARCEL 2** is white colored, medium-sized USPS Flat Rate Box. **SUBJECT PARCEL 2** is addressed to "Jival PATEl, 728 Horizon Drive, Grand Junction. CO 81506." The return address listed on **SUBJECT PARCEL 2** is "Sumitra Patel, SHOP-N-GO, 656 N Mountain Ave, Upland, CA 91786." **SUBJECT PARCEL 2** was postmarked on August 30, 2024, in the 91785 zip code.

c. **SUBJECT PARCEL 3** is a USPS Priority Mail parcel bearing tracking number 9505 5148 8631 4248 7990 44. **SUBJECT PARCEL 3** is a brown colored, large-sized cardboard box. **SUBJECT PARCEL 3** is addressed to "Troy Newman, 3040 Seneca Chief Trl,

Ellicott City, MD 21042-1418." The return address listed on **SUBJECT PARCEL 3** is "Erick Newman, 5628 Andover way, Chino Hills CA 91709." **SUBJECT PARCEL 3** was postmarked on September 4, 2024, in the 91709 zip code.

d. **SUBJECT PARCEL 4** is a USPS Priority Mail parcel bearing tracking number 9505 5148 9697 4248 9248 38. **SUBJECT PARCEL 4** is a brown colored, large-sized cardboard box. **SUBJECT PARCEL 4** is addressed to "Troy Newman, 3040 Seneca Chief Trl, Ellicott City, MD 21042-1418." The return address listed on **SUBJECT PARCEL 4** is "Erick Newman, 5628 Andover Way, Chino Hills CA 91709." **SUBJECT PARCEL 4** was postmarked on September 4, 2024, in the 91708 zip code.

e. **SUBJECT PARCEL 5** is a USPS Priority Mail Express parcel bearing tracking number EI 480 028 638 US. **SUBJECT PARCEL 5** is a white colored, medium-sized USPS Mailing Box. **SUBJECT PARCEL 5** is addressed to "DEBBIE, 228 West 63rd St. Apt #1A, NY NY 10023." The return address listed on **SUBJECT PARCEL 5** is "Dee, 3130 East Sendor Court., ONtiro. CA 91761." **SUBJECT PARCEL 5** was postmarked on September 3, 2024, in the 91743 zip code.

f. **SUBJECT PARCEL 6** is a USPS Priority Mail parcel bearing tracking number 9505 5128 5961 4243 6530 30. **SUBJECT PARCEL 6** is a white colored, large-sized USPS Flat Rate Box. **SUBJECT PARCEL 6** is addressed to "Sonny Soloman, 112 Hough Ave. APT B, Norfolk, VA 23523." The return address listed on **SUBJECT PARCEL 6** is "S. Owens, 1720 E. D st 14B, Ontario, Ca 91764." **SUBJECT PARCEL 6** was postmarked on August 30, 2024, in the 91761

zip code.

g. **SUBJECT PARCEL 7** is a USPS Priority Mail parcel bearing tracking number 9505 5130 1217 4248 8615 49. **SUBJECT PARCEL 7** is a white colored, large-sized USPS Flat Rate Box. **SUBJECT PARCEL 7** is addressed to "ALEX HERNANDEZ, 5246 PiNEVIEW Dr, Winston SALEM NC 27105." The return address listed on **SUBJECT PARCEL 7** is "ANDY HERNANDEZ, 122 E ADAMS BLVD, LA CA 90011." **SUBJECT PARCEL 7** was postmarked on September 4, 2024, in the 91748 zip code.

h. **SUBJECT PARCEL 8** is a USPS Priority Mail parcel bearing tracking number 9505 5145 0192 4248 6960 56. **SUBJECT PARCEL 8** is a white colored, large-sized USPS Flat Rate Box. **SUBJECT PARCEL 8** is addressed to "DONALD MORALES, 201 Spruce dr, Holbrook NY 11741." The return address listed on **SUBJECT PARCEL 8** is "MARIA MORALES, 13602 olive st, Balwin Park CA. 91706." **SUBJECT PARCEL 8** was postmarked on September 4, 2024, in the 91706 zip code.

i. **SUBJECT PARCEL 9** is a USPS Priority Mail parcel bearing tracking number 9505 5144 9402 4248 8723 11. **SUBJECT PARCEL 9** is a white colored, medium-sized USPS Flat Rate Box. **SUBJECT PARCEL 9** is addressed to "Aung San, 5625 Wickershire Ln, Saint Louis, MO 63129." The return address listed on **SUBJECT PARCEL 9** is "Pao Yeh, 1118 E. Grove center St., W. Covina, CA 91790." **SUBJECT PARCEL 9** was postmarked on September 4, 2024, in the 91722 zip code.

j. **SUBJECT PARCEL 10** is a USPS Priority Mail parcel bearing tracking number 9505 5141 0250 4248 5973 98. **SUBJECT**

PARCEL 10 is a white colored, large-sized USPS Flat Rate Box. **SUBJECT PARCEL 10** is addressed to "Sigan Vera, 306 Shinoak Dr., Live Oak, TX 78233." The return address listed on **SUBJECT PARCEL 10** is "M Jones, 10104 Ashon St, El Monte CA 91733." **SUBJECT PARCEL 10** was postmarked on September 4, 2024, in the 91734 zip code.

k. **SUBJECT PARCEL 11** is a USPS Priority Mail parcel bearing tracking number 9505 5141 0250 4248 5973 74. **SUBJECT PARCEL 11** is a white colored, large-sized USPS Flat Rate Box. **SUBJECT PARCEL 11** is addressed to "Sigan Vera, 306 Shinoak Dr., Live Oak, TX 78233." The return address listed on **SUBJECT PARCEL 11** is "M Jones, 10104 Ashon St, El Monte CA 91733." **SUBJECT PARCEL 11** was postmarked on September 4, 2024, in the 91734 zip code.

l. **SUBJECT PARCEL 12** is a USPS Priority Mail parcel bearing tracking number 9505 5130 1244 4248 0766 19. **SUBJECT PARCEL 12** is a pink colored, medium-sized box. **SUBJECT PARCEL 12** is addressed to "4892 Raleigh Lagrande Rd Apt #3, Memphis Tennessee, 38128." The return address listed on **SUBJECT PARCEL 12** is "901 Centinela ave, Inglewood, CA." **SUBJECT PARCEL 12** was postmarked on September 4, 2024, in the 91723 zip code.

m. **SUBJECT PARCEL 13** is a USPS Priority Mail Express parcel bearing tracking number EJ 115 518 580 US. **SUBJECT PARCEL 13** is a white colored, medium-sized USPS Mailing Envelope. **SUBJECT PARCEL 13** is addressed to "SANG LEE, 326 S. WESTLAKE AVE. APT. #202, LOS ANGELES, CA 90057." The return address listed on **SUBJECT PARCEL 13** is "MIKE FEAMAN, 5338 STATE

RT.3, ELLIS GROVE, IL 92241." **SUBJECT PARCEL 13** was postmarked on September 3, 2024, in the 92223 zip code.

ATTACHMENT B

ITEMS TO BE SEIZED

The items to be seized are evidence, contraband, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "**Subject Offenses**"), namely:

- a. Any controlled substances, including marijuana;
- b. Currency, money orders, bank checks, or similar monetary instruments in aggregate quantities over \$1,000; and
- c. Parcel wrappings, and any associated packaging material.

AFFIDAVIT

I, Zachary Sumpter, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of an application for a warrant to search the following three United States Postal Service ("USPS") Priority Mail Express parcels and ten USPS Priority Mail parcels in the custody of the United States Postal Inspection Service ("USPIS") in City of Industry, California, within the Central District of California (collectively, the "**SUBJECT PARCELS**"), as described more fully in Attachment A:

a. A USPS Priority Mail Express parcel bearing tracking number EI 701 829 190 US ("**SUBJECT PARCEL 1**");

b. A USPS Priority Mail parcel bearing tracking number 9505 5163 3324 4243 9231 13 ("**SUBJECT PARCEL 2**");

c. A USPS Priority Mail parcel bearing tracking number 9505 5148 8631 4248 7990 44 ("**SUBJECT PARCEL 3**");

d. A USPS Priority Mail parcel bearing tracking number 9505 5148 9697 4248 9248 38 ("**SUBJECT PARCEL 4**");

e. A USPS Priority Mail Express parcel bearing tracking number EI 480 028 638 US ("**SUBJECT PARCEL 5**");

f. A USPS Priority Mail parcel bearing tracking number 9505 5128 5961 4243 6530 30 ("**SUBJECT PARCEL 6**");

g. A USPS Priority Mail parcel bearing tracking number 9505 5130 1217 4248 8615 49 ("**SUBJECT PARCEL 7**");

h. A USPS Priority Mail parcel bearing tracking number 9505 5145 0192 4248 6960 56 ("**SUBJECT PARCEL 8**");

i. A USPS Priority Mail parcel bearing tracking number 9505 5144 9402 4248 8723 11 ("SUBJECT PARCEL 9");

j. A USPS Priority Mail parcel bearing tracking number 9505 5141 0250 4248 5973 98 ("SUBJECT PARCEL 10");

k. A USPS Priority Mail parcel bearing tracking number 9505 5141 0250 4248 5973 74 ("SUBJECT PARCEL 11");

l. A USPS Priority Mail parcel bearing tracking number 9505 5130 1244 4248 0766 19 ("SUBJECT PARCEL 12");

m. A USPS Priority Mail Express parcel bearing tracking number EJ 115 518 580 US ("SUBJECT PARCEL 13").

2. The requested search warrant seeks authorization to seize evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "Subject Offenses"), as described more fully in Attachment B.

Attachments A and B are incorporated by reference herein.

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all

conversations and statements described in this affidavit are related in substance and in part only.

II. TRAINING AND EXPERIENCE

4. I am a Task Force Officer ("TFO") with the United States Postal Inspection Service ("USPIS") and have been so since November 2021. I am currently assigned as a TFO to the Contraband Interdiction and Investigations South Team of the Los Angeles Division, which is responsible for investigating drug trafficking involving the United States Mail. Accordingly, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7). Specifically, I am an officer of the United States empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. Prior to being assigned as a TFO with the USPIS, I worked patrol as a full-time sworn law enforcement officer with the Chino Police Department.

5. I have received training and have experience investigating violations of state and federal narcotics and money laundering laws. I have been involved in various electronic surveillance methods including state and federal wiretap investigations, the debriefing of informants and witnesses, as well as others who have knowledge of the manufacturing, distribution, transportation, storage, and importation of controlled substances, and the laundering of drug proceeds. I have participated in many aspects of drug investigations, including investigations into the smuggling of

illegal drugs, money laundering, and extortion related to drug trafficking. I am familiar with narcotics traffickers' methods of operation, including the manufacturing, storage, transportation, and distribution of narcotics, the collection of money that represents the proceeds of narcotics trafficking, and money laundering. I am familiar with how drug traffickers use counter-surveillance techniques to avoid detection by law enforcement.

III. SUMMARY OF PROBABLE CAUSE

6. Between September 3, 2024, and September 5, 2024, at the City of Industry USPS Processing and Distribution Center in Los Angeles County, California, I identified the **SUBJECT PARCELS** as meeting some of the following criteria common to packages containing contraband, including that they were excessively taped, contained handwritten labels, lacked business account numbers, and, according to law enforcement databases, contained sender and recipient names that were not associated with their respective listed addresses.

7. Additionally, on September 5, 2024, a trained drug detection dog alerted to each of the **SUBJECT PARCELS** for the presence of drugs or other items, such as the proceeds of drug sales that have been contaminated by drugs.

IV. STATEMENT OF PROBABLE CAUSE

A. Background on Use of Mail for Drug Trafficking

8. Based on my training and experience as a TFO, and the experiences related to me by Postal Inspectors who specialize in drug investigations, I know the following:

a. Postal Inspectors have been conducting investigations of drug trafficking via USPS Express Mail and Priority Mail since the mid-1980s. In the early 1990s, Postal Inspectors in Los Angeles, California, began conducting organized interdictions of Priority Mail Express and Priority Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances. Postal Inspectors also regularly examined and investigated Priority Mail Express and Priority Mail parcels. During the 1990s, Postal Inspectors observed that the trend was for drug traffickers to send controlled substances and proceeds from the sale of controlled substances, in the form of cash, using boxes.

b. Although Postal Inspectors still see boxes used to send for controlled substances and cash, there has been a gradual change over the years toward the current trend of using smaller boxes, flat cardboard envelopes, and Tyvek envelopes, with proceeds from the sale of controlled substances converted to money orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances, which lend a sense of legitimacy to the parcel's appearance.

c. Los Angeles is a significant source area for controlled substances. Controlled substances are frequently transported from the Los Angeles area via US Mail, and the proceeds from the sale of controlled substances are frequently returned to the Los Angeles area via US Mail. These proceeds are generally in the form of money orders, bank checks, or similar

monetary instruments in an amount over \$1,000. Based on my training and experience, I know that proceeds from the sale of controlled substances often contain the odor of drugs because they have been contaminated by or associated with the odor of one or more drugs.

d. Drug distributors often use USPS Priority Mail Express, which is the USPS overnight/next day delivery mail product, or Priority Mail Service, which is the USPS two-to-three-day delivery mail product. Drug distributors use the Priority Mail Express delivery service because of its speed, reliability, and the ability to track the parcel's progress to delivery. Drug distributors use the Priority Mail delivery service because it provides them more time for travel between states if they decide to follow their shipments to their destination for distribution. Also, by adding delivery confirmation to a Priority Mail parcel, drug traffickers have the ability to track the parcel's progress to the intended delivery point, as if the parcel had been mailed using the Priority Mail 2-Day Service.

9. The following indicia suggest that a parcel may contain drugs or drug distribution proceeds:

- a. The parcel is contained in a Large Flat Rate cardboard box;
- b. The parcel bears a handwritten or typed label, whether USPS Express Mail or Priority Mail;
- c. The handwritten or typed label on the parcel does not contain a business account number;

d. The seams of the parcel are all taped or glued shut;

e. The parcel emits an odor of a cleaning agent or adhesive or spray foam that can be detected by a human; and

f. Multiple parcels are mailed by the same individual, on the same day, from different locations.

10. Parcels exhibiting such indicia may be subject to further investigation, which may include verification of the addressee and return addresses.

11. I know from my training and experience that drug traffickers often use fictitious or incomplete names and addresses in an effort to conceal their identities from law enforcement officers investigating these types of cases. To the extent that real addresses are ever used, it is only to lend a legitimate appearance to the parcel and is almost always paired with a false name.

B. Initial Investigation of the SUBJECT PARCELS

12. Between September 3, 2024, and September 5, 2024, during routine parcel inspections at the City of Industry USPS Processing and Distribution Center, I determined that the **SUBJECT PARCELS** met some of the initial suspicious characteristics as described above. Specifically, I determined the following:

a. **SUBJECT PARCEL 1** is a USPS Priority Mail Express parcel bearing tracking number EI 701 829 190 US. **SUBJECT PARCEL 1** is a brown colored, large-sized USPS ReadyPost cardboard box. **SUBJECT PARCEL 1** has copious amounts of tape on

its seams, has a handwritten label and does not contain a business account number. According to law enforcement records, the return address listed on **SUBJECT PARCEL 1** - "1130 N 13th Ave, Upland, CA 91786" - appears to be a legitimate address but is not associated with the listed sender, "Ashley Howard." The recipient address listed on **SUBJECT PARCEL 1** - "2704 Boxelder Ct., Raliegh, NC 27610" - appears to be a legitimate address but is not associated with the listed recipient, "Melissa Howard."

b. **SUBJECT PARCEL 2** is a USPS Priority Mail parcel bearing tracking number 9505 5163 3324 4243 9231 13. **SUBJECT PARCEL 2** is white colored, medium-sized USPS Flat Rate Box. **SUBJECT PARCEL 2** has handwritten address information, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 2** - "656 N Mountain Ave, Upland, CA 91786" appears to be a legitimate address, and is associated with the listed sender, "Sumitra Patel and SHOP-N-GO." The recipient address listed on **SUBJECT PARCEL 2** - "728 Horizon Drive, Grand Junction. CO 81506" appears to be a legitimate address, but is not associated with the listed recipient, "Jival PATEl."

c. **SUBJECT PARCEL 3** is a USPS Priority Mail parcel bearing tracking number 9505 5148 8631 4248 7990 44. **SUBJECT PARCEL 3** is a brown colored, large-sized cardboard box. **SUBJECT PARCEL 3** has copious amounts of clear tape, has handwritten address information, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 3** - "5628 Andover way, Chino Hills CA

91709," appears to be legitimate address, but is not associated with the listed sender, "Erick Newman." The recipient address listed on **SUBJECT PARCEL 3** - "3040 Seneca Chief Trl, Ellicott City, MD 21042-1418" appears to be a legitimate address, but is not associated with the listed recipient, "Troy Newman."

d. **SUBJECT PARCEL 4** is a USPS Priority Mail parcel bearing tracking number 9505 5148 9697 4248 9248 38. **SUBJECT PARCEL 4** is a brown colored, large-sized cardboard box. **SUBJECT PARCEL 4** has copious amounts of clear tape, has handwritten address information, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 4** - "5628 Andover Way, Chino Hills CA 91709," appears to be legitimate address, but is not associated with the listed sender, "Erick Newman." The recipient address listed on **SUBJECT PARCEL 4** - "3040 Seneca Chief Trl, Ellicott City, MD 21042-1418," appears to be a legitimate address, but is not associated with the listed recipient, "Troy Newman."

e. **SUBJECT PARCEL 5** is a USPS Priority Mail Express parcel bearing tracking number EI 480 028 638 US. **SUBJECT PARCEL 5** is a white colored, medium-sized USPS Mailing Box. **SUBJECT PARCEL 5** has a handwritten label, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 5** - "3130 East Sendor Court., ONtiro. CA 91761" appears to be legitimate address, but is not associated with the listed sender, "Dee." The recipient address listed on **SUBJECT PARCEL 5** - "228 West 63rd

St. Apt #1A, NY NY 10023" appears to be a legitimate address, but is not associated with the listed recipient, "DEBBIE."

f. **SUBJECT PARCEL 6** is a USPS Priority Mail parcel bearing tracking number 9505 5128 5961 4243 6530 30. **SUBJECT PARCEL 6** is a white colored, large-sized USPS Flat Rate Box. **SUBJECT PARCEL 6** has a handwritten label, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 6** - "1720 E. D st 14B, Ontario, Ca 91764" appears to be legitimate address, but is not associated with the listed sender, "S. Owens." The recipient address listed on **SUBJECT PARCEL 6** - "112 Hough Ave. APT B, Norfolk, VA 23523" appears to be a legitimate address, but is not associated with the listed recipient, "Sonny Solomon."

g. **SUBJECT PARCEL 7** is a USPS Priority Mail parcel bearing tracking number 9505 5130 1217 4248 8615 49. **SUBJECT PARCEL 7** is a white colored, large-sized USPS Flat Rate Box. **SUBJECT PARCEL 7** has brown tape on its center seam, has handwritten address information, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 7** - "122 E ADAMS BLVD, LA CA 90011," appears to be legitimate address, but is not associated with the listed sender, "ANDY HERNANDEZ." The recipient address listed on **SUBJECT PARCEL 7** - "5246 PINEVIEW Dr, Winston SALEM NC 27105" appears to be a legitimate address, but is not associated with the listed recipient, "ALEX HERNANDEZ."

h. **SUBJECT PARCEL 8** is a USPS Priority Mail parcel

bearing tracking number 9505 5145 0192 4248 6960 56. **SUBJECT PARCEL 8** is a white colored, large-sized USPS Flat Rate Box. **SUBJECT PARCEL 8** has copious amounts of clear tape, has handwritten address information, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 8** - "13602 olive st, Balwin Park CA. 91706," appears to be legitimate address, and is associated with the listed sender, "MARIA MORALES." The recipient address listed on **SUBJECT PARCEL 8** - "201 Spruce dr, Holbrook NY 11741," appears to be legitimate address, and is associated with the listed sender, "DONALD MORALES."

i. **SUBJECT PARCEL 9** is a USPS Priority Mail parcel bearing tracking number 9505 5144 9402 4248 8723 11. **SUBJECT PARCEL 9** is a white colored, medium-sized USPS Flat Rate Box. **SUBJECT PARCEL 9** has handwritten address information and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 9** - "1118 E. Grove center St., W. Covina, CA 91790," appears to be legitimate address, and is associated with the listed sender, "Pao Yeh." The recipient address listed on **SUBJECT PARCEL 9** - "5625 Wickershire Ln, Saint Louis, MO 63129," appears to be legitimate address, and is associated with the listed sender, "Aung San."

j. **SUBJECT PARCEL 10** is a USPS Priority Mail parcel bearing tracking number 9505 5141 0250 4248 5973 98. **SUBJECT PARCEL 10** is a white colored, large-sized USPS Flat Rate Box. **SUBJECT PARCEL 10** has copious amounts of clear tape, has

handwritten address information, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 10** - "10104 Ashon St, El Monte CA 91733," appears to be legitimate address, but is not associated with the listed sender, "M Jones." The recipient address listed on **SUBJECT PARCEL 10** - "306 Shinoak Dr., Live Oak, TX 78233," appears to be legitimate address, but is not associated with the listed sender, "Sigon Vera."

k. **SUBJECT PARCEL 11** is a USPS Priority Mail parcel bearing tracking number 9505 5141 0250 4248 5973 74. **SUBJECT PARCEL 11** is a white colored, large-sized USPS Flat Rate Box. **SUBJECT PARCEL 11** has copious amounts of clear tape, has handwritten address information, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 11** - "10104 Ashon St, El Monte CA 91733," appears to be legitimate address, but is not associated with the listed sender, "M Jones." The recipient address listed on **SUBJECT PARCEL 11** - "306 Shinoak Dr., Live Oak, TX 78233," appears to be legitimate address, but is not associated with the listed sender, "Sigon Vera."

l. **SUBJECT PARCEL 12** is a USPS Priority Mail parcel bearing tracking number 9505 5130 1244 4248 0766 19. **SUBJECT PARCEL 12** is a pink colored, medium-sized box. **SUBJECT PARCEL 12** has copious amounts of clear tape, has handwritten address information, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 12** - "901 Centinela ave, Inglewood, CA,"

appears to be legitimate address, but there was no listed sender name. The recipient address listed on **SUBJECT PARCEL 12** - "4892 Raleigh Lagrande Rd Apt #3, Memphis Tennessee, 38128" appears to be legitimate address, but there was no listed recipient name.

m. **SUBJECT PARCEL 13** is a USPS Priority Mail Express parcel bearing tracking number EJ 115 518 580 US. **SUBJECT PARCEL 13** is a white colored, medium-sized USPS Mailing Envelope. **SUBJECT PARCEL 13** has a handwritten label and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 13** - "5338 STATE RT.3, ELLIS GROVE, IL 92241," appears to be legitimate address, and is associated with the listed sender, "MIKE FEAMAN." The recipient address listed on **SUBJECT PARCEL 13** - "326 S. WESTLAKE AVE. APT. #202, LOS ANGELES, CA 90057" appears to be legitimate address, and is associated with the listed sender, "SANG LEE."

C. Drug-Detection Dog Alerts to the SUBJECT PARCELS

13. On September 5, 2024, based on the suspicious characteristics of the SUBJECT PARCELS, El Monte Police Department Officer Adam Girgle had his trained drug detection dog, "Kash," examine the exterior of the **SUBJECT PARCELS**. I learned from Officer Girgle that Kash gave a positive alert to **SUBJECT PARCEL 1 through SUBJECT PARCEL 13** separately, indicating the presence of controlled substances or other items, such as the proceeds of controlled substances, which have been recently contaminated with the odor of controlled substances. Attached hereto as Exhibit 1, which I incorporate fully herein

by reference, are documents setting forth information provided by Officer Girgle regarding Kash's training and history in detecting controlled substances, and the examination of **SUBJECT PARCELS 1 through 13.**

V. CONCLUSION

14. For the reasons above, there is probable cause to believe that the **SUBJECT PARCELS**, as described in Attachment A, contain evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance), as described in Attachment B.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 9th day of September 2024.

HONORABLE CHARLES F. EICK
UNITED STATES MAGISTRATE JUDGE

EXHIBIT 1

AFFIDAVIT

I, Officer Adam Girgle, being duly sworn, declare and state as follows:

I have been a Police Officer with the El Monte Police Department since December of 2003. I have handled and/or assisted with hundreds of narcotics investigations. I have assisted Federal and State narcotics task forces with large scale narcotics investigations. I graduated from the Los Angeles County Sheriff's Department Academy in May of 2001. I attended the Adlerhorst Police Canine Handler course in August of 2016.

I also attended the Gold Coast Canine Narcotics Detection course in February of 2024. During these courses, my police canine partner Kash and I received 240 hours of instruction in the detection of the odor of illegal narcotics. During these courses, I personally observed my police canine partner Kash alert to the presence of the odor of illegal narcotics. My police canine partner Kash was certified to alert to the presence of marijuana, methamphetamine, cocaine, heroin and fentanyl. My police canine partner and I receive yearly certification from the Los Angeles County Police Canine Association in narcotics detection. My police canine partner and I last certified in February 2024.

I am familiar and knowledgeable in the behaviors my police canine partner Kash engages in when he detects the presence of the odor of illegal narcotics. I conduct continual training with my police canine partner Kash by hiding various narcotics in different locations such as buildings, vehicles, bags, parcels and in open areas. This training includes proofing canine Rico on odors such as plastic, boxes, latex, tape, metal, currency (circulated and uncirculated), parcel packaging material, glass pipes and food. I also proof canine Kash of my human odor. This training is on-going and continual.

On September 5, 2024, my police canine partner and I assisted with a narcotic parcel investigation. Canine Kash alerted to the presence of the odor of illegal narcotics emitting from the following parcels.

USPS Parcel: EI 701 829 190 US (Parcel 1)

Addressed To: Melissa Howard

2704 Boxelder Ct.

Raleigh, NC 27610

USPS Parcel: 9505 5163 3324 4243 9231 13 (Parcel 2)

Addressed To: Super 8 Attn: Jinal Patel

728 Horizon Drive

Grand Junction, CO 81506

USPS Parcel: 9505 5148 8631 4248 7990 44 (Parcel 3)

Addressed To: Troy Newman

3040 Seneca Chief Trl

Ellicott City, MD 21042-1418

USPS Parcel: 9505 5148 9697 4248 9248 38 (Parcel 4)

Addressed To: Troy Newman

3040 Seneca Chief Trl

Ellicott City, MD 21042-1418

USPS Parcel: EI 480 028 638 US (Parcel 5)

Addressed To: Debbie

228 West 63rd St. Apt # 1A

NY, NY 10023

USPS Parcel: 9505 5128 5961 4243 6530 30 (Parcel 6)

Addressed To: Sonny Solomon

112 Hough Ave. Apt B

Norfolk, VA 23523

USPS Parcel: 9505 5130 1217 4248 8615 49 (Parcel 7)

Addressed To: Alex Hernandez

5246 Pineview Dr.

Winston Salem, NC 27105

USPS Parcel: 9505 5145 0192 4248 6960 56 (Parcel 8)

Addressed To: Donald Morales

201 Spruce Dr.

Holbrook, NY 11741

USPS Parcel: 9505 5144 9402 4248 8723 11 (Parcel 9)

Addressed To: Aung San

5625 Wickershire Ln.

Saint Louis, MO 63129

USPS Parcel: 9505 5141 0250 4248 5973 98 (Parcel 10)

Addressed To: Sigon Vera

306 Shinoak Dr.

Live Oak, TX 78233

USPS Parcel: 9505 5141 0250 4248 5973 74 (Parcel 11)

Addressed To: Sigon Vera

306 Shinoak Dr.

Live Oak, TX 78233

USPS Parcel: 9505 5130 1244 4248 0766 19 (Parcel 12)

Addressed To:

4892 Raleigh Lagrande Rd. Apt. #3

Memphis, Tennessee 38128

USPS Parcel: EJ 115 518 580 US (Parcel 13)

Addressed To: Sang Lee

326 S. Westlake Ave. Apt. #202

Los Angeles, CA 90057

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at City of Industry, California, on September 5, 2024.

A handwritten signature in black ink, appearing to read "C. S. S." or a similar variation, is placed here.